

# **Construction Industry Coalition on Water Quality**

September 16, 2014

Mr. Ivar Ridgeway, Chief, Storm Water Permitting  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Via Email: [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov)

RE: LA County MS4 Permit—Comments on XXXXX EWMP/WMP

Dear Mr. Ridgeway:

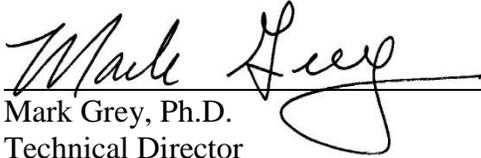
The Construction Industry Coalition on Water Quality (CICWQ) is submitting comments concerning the preparation of Enhanced Watershed Management Program Plans (EWMPs or Plans) for 12 watershed management groups in Los Angeles County. These plans are also accompanied by Coordinated Integrated Monitoring Program Plans (CIMPs). We are submitting this letter on behalf of the CICWQ membership, which is described below.

CICWQ is an advocacy, education, and research 501(c)(6) non-profit group of trade associations representing builders and trade contractors, home builders, labor unions, landowners, and project developers. CICWQ membership is comprised of members of four construction and building industry trade associations in southern California: The Associated General Contractors of California, Building Industry Association of Southern California, Engineering Contractors Association, and Southern California Contractors Association, as well as the United Contractors located in San Ramon. Collectively, members of these associations build a significant portion of the transportation, public and private infrastructure, and commercial and residential land development projects in California.

We have reviewed the 12 EWMPs and their thousands of pages of combined content including CIMP documents. The 12 work plans reviewed are plans for EWMP preparation, due to the Regional Board in March 2015. As such, there appears to our membership little to comment on at this point other than the overall extensive nature of the watershed planning program underway, and the potential huge cost burden these plans (especially the CIMP) place on municipalities and dischargers within those municipalities. Our comment letter submitted on August 18, 2014 describes our concerns in more detail and is applicable to the EWMP work plans under consideration.

CICWQ's membership is in the forefront of water quality regulation, providing to water quality regulators practical ideas and solutions that are implementable and that have as their goal clean water outcomes. If you have any questions or want to discuss the content of our comment letter, please feel free to contact me at (951) 781-7310, ext. 210, (909) 525-0623, cell phone, or [mgrey@biasc.org](mailto:mgrey@biasc.org).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Grey", written over a horizontal line.

Mark Grey, Ph.D.

Technical Director

Construction Industry Coalition on Water Quality